

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
:  
UNITED STATES OF AMERICA :  
:  
-v.- : DECLARATION IN SUPPORT  
RYAN SALAME, : OF FINAL ORDER OF  
Defendant. : FORFEITURE  
:  
----- X  
:

Thane Rehn, pursuant to Title 28, United State Code, Section 1746, declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Matthew Podolsky, Acting United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about September 7, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Substitute Assets/Money Judgment (the "Preliminary Order of Forfeiture") (D.E. 268) with respect to RYAN SALAME (the "Defendant"), forfeiting to the United States all right, title and interest of the Defendant in, *inter alia*, the following substitute assets:

- a. The real property commonly described as 12 Housatonic Street, Lenox, MA 01240 (the "Housatonic Property"), described as follows:

Beginning at a point in the southerly line of Housatonic Street at a northwesterly corner of land formerly of William C. Schennerhorn, now of Lenox Library Association, thence along a westerly line of said Library land south 28° 40' west seventy two feet and nine inches to an angle in said line marked by an octagonal shaped monument buried in the ground, thence along said Library

land north 61° 20' west one hundred feet to land of Frank C. Hagyard, thence north 28° 40 east seventy two feet and nine inches along said Hagyard land to said southerly line of said Housatonic Street, thence along said line of said street south 61° 20' east one hundred feet to the place of beginning;

- b. The real property commonly described as 8 Tucker Street, Lenox, MA 01240 (the “Tucker Property”), described as follows:

A parcel of land as shown on survey plan captioned "MARY F. MISCH, Property located at 8 & 12 Tucker Street, Lenox, MA, drawn by Hill Engineers Architects and Planners, Scale 1" = 20', dated 11/19/2021" recorded in the Berkshire Middle District Registry of Deeds on December 6, 2021 in Plat S-83.

Being the same premises conveyed to the Grantor hereby by deed of Mary F. Misch dated December 2, 2021 and recorded December 7, 2021 in the Berkshire Middle District Registry of Deeds in Book 7077, Page 274; and

- c. Ownership and equity interest in East Rood Farm Corporation (the “ERF Corporation”);

(a. through c., collectively, the “Substitute Assets”).

3. The Notice of Forfeiture and the intent of the Government to dispose of the Substitute Assets was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) beginning on September 20, 2023 for thirty (30) consecutive days, through October 19, 2023 pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court February 14, 2025 (D.E. 559).

4. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Substitute Assets have been filed.

5. The Defendant is the only person and/or entity known by the Government to have a potential interest in the Substitute Assets.

6. On or about February 15, 2024, the Court entered a Consent Interlocutory Sale Order authorizing the Government to sell the Housatonic Property, the Tucker Property and the ERF Corporation pending the entry of a final order of forfeiture.

7. Pursuant to the Interlocutory Sale Order, the Government sold the Housatonic Property and on or about March 6, 2024, the Government received \$1,265,676.23 representing the net sale proceeds of the Housatonic Property (the "Housatonic Proceeds")

8. Pursuant to the Interlocutory Sale Order, the Government sold the Tucker Properties and on or about November 14, 2023, the Government received \$729,928.86 representing the net sale proceeds of the Tucker Properties (the "Tucker Proceeds").

9. Pursuant to the Interlocutory Sale Order, the Government sold the ERF Corporation and on or about June 12, 2024, the Government received \$125,000.00 representing the net sale proceeds of the ERF Corporation (the "ERF Corporation Proceeds", together with the Housatonic Proceeds and the Tucker Proceeds, the "Forfeitable Property" ).

10. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture as to the Forfeitable Property.

11. No previous application for the relief requested herein has been sought.

Dated: February 14, 2025  
New York, New York

MATTHEW PODOLSKY  
Acting United States Attorney  
Southern District of New York

By:



Thane Rehn  
Assistant United States Attorney  
26 Federal Plaza, 38<sup>th</sup> Floor  
New York, New York  
Tel. (212) 637-2354